

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 JOANNE L. DIAMOND
5 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577
Joanne_Diamond@fd.org

6 Attorney for Mark Canlas Cuyugan

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9
10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13
14 MARK CANLAS CUYUGAN,

15 Defendant.

Case No. 2:19-cr-00300-JCM-EJY

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
18 Chiou, Acting United States Attorney, and Simon F. Kung, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public
21 Defender, counsel for Mark Canlas Cuyugan, that the Court modify his conditions
22 of release.

23 The Stipulation is entered into for the following reasons:

24 1. On November 20, 2019, the Court ordered Mr. Cuyugan's release on
25 a personal recognizance bond with certain conditions, including a requirement that
26 he not open new bank accounts or lines of credit. ECF No. 32 at 5.

2. Mr. Cuyugan is considering setting up a small business. If he does, he will need to open a business bank account.

3. Mr. Cuyugan moves the Court to modify the condition so he can open a business bank account with the prior authorization of Pretrial Services.

4. Counsel has spoken with Pretrial Services concerning this issue. Pretrial Services supports the requested modification.

5. The government has no objection to the requested modification.

DATED November 15, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ *Joanne L. Diamond*
By _____
JOANNE L. DIAMOND
Assistant Federal Public Defender

/s/ *Simon F. Kung*
By _____
SIMON F. KUNG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARK CANLAS CUYUGAN,
Defendant.

Case No. 2:19-cr-00300-JCM-EJY

ORDER

IT IS THEREFORE ORDERED that Mr. Cuyugan's conditions of release be modified to allow him to open a business bank account, with the prior authorization of Pretrial Services.

DATED November 15, 2021.

James C. Mahan
UNITED STATES DISTRICT JUDGE